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15 **UNITED STATES DISTRICT COURT**
16
EASTERN DISTRICT OF WASHINGTON
17
AT YAKIMA

18 STATE OF WASHINGTON, STATE OF
19 COLORADO, STATE OF CONNECTICUT,
20 STATE OF ILLINOIS, STATE OF
21 MARYLAND, STATE OF MICHIGAN,
22 STATE OF MINNESOTA, STATE OF
23 NEVADA, STATE OF NEW MEXICO,
24 STATE OF OREGON, STATE OF RHODE
25 ISLAND, STATE OF VERMONT,
COMMONWEALTH OF VIRGINIA, and
STATE OF WISCONSIN,

NO. 1:20-cv-03127-SAB

DEFENDANTS' NOTICE OF DATA
IN RESPONSE TO THE COURT'S
OCTOBER 30, 2020 ORDER

26 Plaintiffs,
27
28 v.

DONALD J. TRUMP, in his official capacity
as President of the United States of America;
UNITED STATES OF AMERICA; LOUIS
DEJOY, in his official capacity as Postmaster
General; UNITED STATES POSTAL
SERVICE,

Defendants.

NOTICE OF DATA

Pursuant to the Court’s October 30, 2020 order (ECF No. 103), Defendants hereby respectfully submit data reports reflecting the “all clear” status for each United States Postal Service plant in the Detroit and Lakeland geographical areas for November 1, 2020. USPS maintains plant-related data in such a way that there is no straightforward way to disaggregate data related to Detroit and Lakeland only. Thus, the attached report for all plants is over-inclusive, *i.e.*, the report includes data concerning the Detroit and Lakeland geographic areas, but also include plants outside of those areas. In other words, for database purposes, data concerning Detroit and Lakeland plants are included in data extracted for the Westshore and Lakeshores Districts. USPS Delivery/Retail Units do not report on Sundays. Thus, no data is available for Delivery/Retail Units for November 1, 2020.

Defendants provided the attached data to counsel for Plaintiffs via e-mail prior to filing. Filing with the Court was slightly delayed due to Defendants' concurrent data reporting obligations in several other cases, which involve the same personnel, and counsel for Defendants' effort to accommodate Plaintiffs' recent request to visit two USPS facilities in Michigan.

1 Dated: November 2, 2020

Respectfully submitted,

2 JEFFREY BOSSERT CLARK
3 Acting Assistant Attorney General

4 ERIC R. WOMACK
5 Assistant Director, Federal Programs Branch

6 */s/ Joseph E. Borson*

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of November, I electronically filed the foregoing Notice of Data in Response to the Court's October 30, 2020 Order with the Clerk by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: November 2, 2020

By: /s/Alexis J. Echols
ALEXIS J. ECHOLS

Counsel for Defendants